



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 15, 2016

Via ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
New York, New York 10007

**Re: United States v. Ludwig Criss Zelaya Romero, et al.,
S1 15 Cr. 174 (LGS)**

Dear Judge Schofield:

Based on consultation with Your Honor's chambers, the Government respectfully requests, with the consent of defense counsel, that the Court adopt the following schedule in this matter:

- Discovery to be completed by July 29, 2016;
- Any defense motions to be filed by October 14, 2016;
- Government response to any defense motions to be filed by November 4, 2016;
- Any defense reply submissions by November 18, 2016; and
- A status conference at a time convenient to the Court on December 15, 16, or 19, 2016.

The Government further requests, also on consent, that time be excluded in the interest of justice under the Speedy Trial Act, *see* 18 U.S.C. § 3161(h)(7)(A), between the date of

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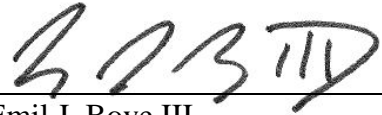
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the Court's scheduling order in this matter and the date of the status conference in order to permit the defendants to review discovery and contemplate the filing of motions, and to allow the parties to engage in plea negotiations.

Respectfully submitted,

PREET BHARARA
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Cc: Defense Counsel
(Via ECF)